

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

\*

**v.**

\*

**Crim. No. RDB-19-337**

**DARYL ALBERT VARNUM**

\*

\* \* \* \* \*

**MOTION FOR LEAVE TO AMEND, SUPPLEMENT, WITHDRAW  
OR FILE ADDITIONAL MOTIONS**

Daryl Varnum (“Mr. Varnum”), by and through his undersigned counsel, James Wyda, Federal Public Defender for the District of Maryland and Brendan A. Hurson, Assistant Federal Public Defender, hereby moves this Honorable Court for leave to amend, supplement, withdraw or file additional motions, and in support of his Motion says:

1. Mr. Varnum is charged in a one (1) count indictment alleging a threat against a federal official in violation of 18 U.S.C. § 115(a)(1)(B).

2. Contemporaneous with the filing of this Motion, Mr. Varnum files additional pre-trial motions.

3. The undersigned is still reviewing discovery, investigating, and researching additional possible motions. As such, counsel requests leave to file any additional motions that may prove appropriate to the content of any information received by the government, whether or not such motion is mandatory under Rule 12(b)(3).

4. In addition, Mr. Varnum requests leave to withdraw any Motion, prior to any ruling by the Court, if the relief requested in such motion is no longer desired or appropriate.

**WHEREFORE**, Mr. Varnum requests that this Honorable Court allow him to amend, supplement, withdraw, or file additional motions as necessary.

Respectfully submitted,

JAMES WYDA  
Federal Public Defender

/s/

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